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April 21, 2023

BY ECF

Magistrate Judge Valerie Figueredo
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Xue Shan Wang v. NYC Dept. of Youth and Community Development,
City of New York, et al, 21-cv-6271(LGS)(VF)**

Dear Judge Figueredo,

This firm represents Plaintiff Xue Shan Wang (“Plaintiff”) in the above-referenced workplace disability discrimination and retaliation matter. We write to respectfully request a brief extension of time to complete discovery for the limited purpose of taking the deposition of Defendant NYC Department of Youth and Community Development’s (“Defendant DYCD”) former Deputy General Counsel Latrisha Desrosiers (“Ms. Desrosiers”) for up to three (3) hours. The parties had a “meet and confer” on April 20, 2023 to try to resolve this issue (and other discovery related-issues). The parties were able to resolve the other discovery-related issues but could not come to an agreement over the deposition of Ms. Desrosiers. Discovery in this matter is scheduled to end today.

Plaintiff originally did not intend on taking Ms. Desrosiers’ deposition based on the knowledge that she was Defendant DYCD’s in-house counsel even though we believed that she may be a relevant witness due to correspondence uncovered during discovery that goes beyond providing legal advice, but rather shows discriminatory or retaliatory animus towards Plaintiff. Plaintiff tried to obtain the necessary information pertaining to statements made by Ms. Desrosiers from other deponents but was unable to do so.¹ As a result, we have no choice but to take the deposition of Ms. Desrosiers. However, we are mindful that there would only be limited number of topics in which we could question Ms. Desrosiers based on her former position, and thus we are only seeking to have up to three (3) hours to take her deposition.

This is Plaintiff’s first individual request for an extension of time to complete discovery. The parties have previously made four (4) joint requests for extension to complete discovery and they were all granted.

Based on the foregoing we respectfully request the Court to grant Plaintiff’s request to extend discovery for the limited purpose of taking Ms. Desrosiers’ deposition. The length of this

¹ Plaintiff most recently took the deposition of Defendant Lisa Thornton on April 18, 2023.

extension would be based on when Defendants would be able to produce Ms. Desrosiers for her deposition should the Court grants our request.²

We thank the Court for its continued attention to this matter.

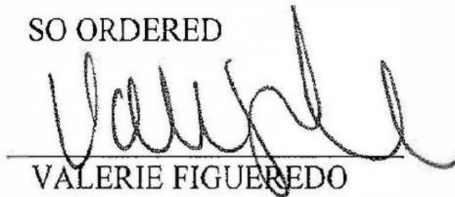
Respectfully Submitted,



William Li

cc: Defendants' Counsel

SO ORDERED



VALERIE FIGUEREDO

United States Magistrate Judge

Dated: 4-24-2023

Plaintiff's application is **GRANTED**. The deadline for discovery in this action is hereby extended to **June 8, 2023** for the limited purpose of conducting the deposition of Ms. Desrosiers, which may last up to three hours. If the parties are unable to schedule and complete the deposition during this time frame, they are directed to submit a joint letter proposing an alternate date for the deposition. The Clerk of Court is directed to terminate the motion at ECF No. 78.

² Although Ms. Desrosiers is no longer employed by Defendant DYCD, but it is our understanding that Defense counsel, the NYC Law Department, would still represent Ms. Desrosiers for her deposition should the Court grants our request.